

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VIETTA L. JOHNSON, M.D., DANIEL
IVANKOVICH, M.D., KAREN NASH, M.D.,

Plaintiffs,

V.

COUNTY OF COOK, COOK COUNTY
BUREAU OF HEALTH SERVICES.

Defendants.

No. 08 C 2139

Judge Castillo

Magistrate Michael W. Dobbins

DEFENDANT'S AGREED MOTION
FOR AN ENLARGEMENT OF TIME

NOW COME the Defendants, County of Cook, Cook County Bureau of Health Services by their attorney, RICHARD A. DEVINE, State's Attorney of Cook County, through his assistant, JAMIESON B. BOWMAN, Assistant State's Attorney, and hereby move this Honorable Court, pursuant to Federal Rule of Civil Procedure 6(b), for an enlargement of time in which to answer or otherwise plead to Plaintiff's Complaint and, in support of this motion, state as follows:

1. The Defendants were served with a summons and complaint in this case on approximately April 24, 2008.
2. Defendants' counsel was assigned to this matter on April 29, 2008.
3. To date, Defendants have been diligently preparing their answer, however, due to unanticipated litigation responsibilities Defendants require an extension of time in which to complete and file their answer.
4. This Motion is not made for dilatory reasons, rather it is a request for additional time made in good faith to enable the undersigned attorney to meet all obligations in a reasonable and orderly manner and will allow him to complete a well

developed answer.

5. Defendants therefore request an extension, until June 6, 2008, within which to file their Answer to the Complaint.
6. Defendants' counsel sought and obtained Plaintiff's counsel's agreement to the Defendants' extension request.
7. This is Defendants' first request for an enlargement of time.
8. The request for an extension is made in good faith and will not prejudice the parties in this matter.

WHEREFORE, Defendants respectfully request that this Honorable Court enlarge the time in which Defendants must answer or otherwise plead an additional 22 days, or until June 6, 2008.

Respectfully submitted,

RICHARD A. DEVINE
State's Attorney of Cook County

BY: _____

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